

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC, Plaintiff,	§ § § § §	JURY TRIAL DEMANDED
v.	§ §	
COMMSCOPE HOLDING COMPANY, INC., COMMSCOPE INC., ARRIS INTERNATIONAL LIMITED, ARRIS GLOBAL LTD., ARRIS US HOLDINGS, INC., ARRIS SOLUTIONS, INC., ARRIS TECHNOLOGY, INC., and ARRIS ENTERPRISES, LLC,	§ § § § § § § § §	Civil Action 2:21-cv-310-JRG (Lead Case)
NOKIA CORP., NOKIA SOLUTIONS AND NETWORKS OY, and NOKIA OF AMERICA CORP.	§ § § § §	Civil Action No. 2:21-cv-309-JRG (Member Case)
Defendants.	§	

**PLAINTIFF TQ DELTA, LLC’S NOTICE OF
DOCUMENTS FOR *IN CAMERA* REVIEW**

As referenced in Plaintiff TQ Delta, LLC’s (“TQ Delta”) Response (Dkt. No. 233) to Nokia Solutions and Networks Oy, and Nokia of America Corp.’s (collectively, “Nokia”) Motion to Compel Discovery (Dkt. No. 201), TQ Delta respectfully submits the accompanying flash drive containing documents for *in camera* review. The flash drive contains the following materials:

- (1) This Notice;
- (2) TQ Delta’s Second Privilege Log;
- (3) The nine (9) relevant valuation reports that have been produced by TQ Delta with redactions, along with corresponding un-redacted versions of each valuation report;
- (4) Ten (10) exemplary invoices from Tzannes Patent Management, LLC that have been produced by TQ Delta with redactions, along with corresponding un-redacted versions of each invoice.

To aid in the Court's review of the above-listed materials, TQ Delta provides the below explanatory notes:

Valuation Reports

Two (2) of the valuation reports (namely, TQD_TX00176571-TQD_TX00176676 and TQD_TX00176677-TQD_TX00176816) contain redactions both to information TQ Delta believes to be privileged and to information TQ Delta seeks to limit discovery of under Federal Rule of Civil Procedure 26(c). So that the Court may differentiate between these two types of redactions, within the un-redacted original versions of the documents the information that has been redacted under an assertion of privilege is highlighted in yellow and the information that has been redacted under Rule 26(c) is highlighted in red. Further, below are tables that provide, for each particular redaction, a citation to the page on which the redaction appears and the basis TQ Delta asserts for maintaining the redaction:

TQD_TX00176571-TQD_TX00176676 (February 10, 2014 Report)	
Redactions Based on AC/WP Privilege	Redactions Based on Rule 26(c)
TQD_TX00176635 - TQD_TX00176637	TQD_TX00176572 - TQD_TX00176575
TQD_TX00176642	TQD_TX00176578
	TQD_TX00176582 - TQD_TX00176619
	TQD_TX00176645 - TQD_TX00176647
	TQD_TX00176649 - TQD_TX00176651
	TQD_TX00176658 - TQD_TX00176663
	TQD_TX00176666

TQD_TX00176677-TQD_TX00176816 (February 19, 2015 Report)	
Redactions Based on AC/WP Privilege	Redactions Based on Rule 26(c)
TQD_TX00176749 - TQD_TX00176751	TQD_TX00176678 - TQD_TX00176681
TQD_TX00176756	TQD_TX00176683
	TQD_TX00176685
	TQD_TX00176690 - TQD_TX00176732

	TQD_TX00176759 - TQD_TX00176773
	TQD_TX00176776 - TQD_TX00176778
	TQD_TX00176785 - TQD_TX00176786
	TQD_TX00176789 - TQD_TX00176795
	TQD_TX00176799 - TQD_TX00176800

For the remainder of the valuation reports, information has only been redacted on the basis of attorney-client communications privilege and/or under the work product doctrine. Within the un-redacted original versions this information has been highlighted in yellow. Citations to the pages within these reports on which the redactions appear are provided below:

Report	Pincite
TQD_TX00176817-TQD_TX00176882 (February 18, 2016 Report)	TQD_TX00176844 - TQD_TX00176845; TQD_TX00176849
TQD_TX00176883-TQD_TX00176952 (March 20, 2017 Report)	TQD_TX00176910 - TQD_TX00176912; TQD_TX00176916
TQD_TX00176953-TQD_TX00177032 (February 20, 2018 Report)	TQD_TX00176981 - TQD_TX00176983; TQD_TX00176986 - TQD_TX00176987
TQD_TX00377136-TQD_TX00377210 (April 12, 2019 Report)	TQD_TX00377163; TQD_TX00377165; TQD_TX00377168 - TQD_TX00377169
TQD_TX00377211-TQD_TX00377251 (February 14, 2020 Report)	TQD_TX00377236 - TQD_TX00377238; TQD_TX00377241
TQD_TX00377252-TQD_TX00377290 (February 15, 2021 Report)	TQD_TX00377277 - TQD_TX00377278; TQD_TX00377280
TQD_TX00429371-TQD_TX00429432 (February 17, 2022)	TQD_TX00429396 - TQD_TX00429398; TQD_TX00429400

TZANNES INVOICES

The ten (10) exemplary redacted invoices are comprised of one (1) invoice selected for each of the years 2013 through 2022. The entirety of the redactions to the invoices were made on the basis of the attorney-client communications privilege and/or the work product doctrine. For each redacted invoice there is a corresponding unredacted original invoice. In each of these

corresponding original invoices, the information that has been redacted has been highlighted in yellow.

Dated: August 1, 2022

/s/ William E. Davis, III

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this August 1,

2022 on all counsel of record, each of whom is deemed to have consented to electronic service.

L.R. CV-5(a)(3)(A).

/s/ William E. Davis, III
William E. Davis, III